

Exhibit A

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

ALAMEDA RESEARCH LLC, ALAMEDA
RESEARCH LTD., FTX TRADING LTD.,
WEST REALM SHIRES, INC., and WEST
REALM SHIRES SERVICES, INC.,

Plaintiffs,

-against-

FTX DIGITAL MARKETS LTD., BRIAN C.
SIMMS, KEVIN G. CAMBRIDGE, and
PETER GREAVES, and J. DOES 1–20

Defendants.

Adv. Pro. No. 23-50145 (JTD)

Re: Adv. Docket No. 6

**STIPULATION BETWEEN THE PARTIES REGARDING BRIEFING
DEADLINES FOR THE JPL DEFENDANTS’ MOTION TO DISMISS**

This stipulation (the “**Stipulation**”) is entered into by and between Alameda Research LLC, Alameda Research Ltd., FTX Trading Ltd., West Realm Shires, Inc., and West Realm Shires Services, Inc. (collectively, the “**Plaintiffs**”) and FTX Digital Markets, Ltd. (“**Digital**”), Brian C. Simms KC, Kevin G. Cambridge and Peter Greaves, the Joint Provisional Liquidators and Foreign

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification numbers are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

Representatives of FTX DM (the “**JPLs**” and, together with Digital, the “**JPL Defendants**,” and together with the Plaintiffs, the “**Parties**”):

WHEREAS, on March 19, 2023, the Plaintiffs commenced the above-captioned adversary proceeding (the “**Adversary Proceeding**”), pending in the United States Bankruptcy Court for the District of Delaware (the “**Court**”) by filing the *Complaint by Alameda Research LLC, Alameda Research Ltd., FTX Trading Limited, West Realm Shires, Inc., West Realm Shires Services, Inc. against FTX Digital Markets Ltd, Brian C. Simms, Kevin G. Cambridge, Peter Greaves and J. Does I-20* [Adv. Docket No. 1] (the “Complaint”);

WHEREAS, on April 21, 2023, the Parties entered into that certain *Stipulation Between the Parties to Extend the JPL Defendants’ Deadline to Answer or Otherwise Respond to the Complaint* [Adv. Docket No. 4], which extended the JPL Defendants’ deadline to answer or otherwise respond to the Complaint to May 8, 2023;

WHEREAS, on May 8, 2023, the JPL Defendants filed the *Motion of FTX Digital Markets Ltd. and the Joint Provisional Liquidators to Dismiss the Complaint or, in the Alternative, to Abstain from Ruling on Counts I-IV* [Adv. Docket No. 6] (the “**Motion to Dismiss**”); and

WHEREAS, the Parties have agreed to extend the deadlines for briefing on the Motion to Dismiss.

THEREFORE, in consideration of the foregoing, the Parties stipulate and agree that:

1. The above recitals are incorporated and made a part of this Stipulation.
2. The Plaintiffs shall have through and including June 14, 2023 to file a response to the Motion to Dismiss. The JPL Defendants shall have through and including July 10, 2023 to file any reply in support of the Motion to Dismiss.

3. The Plaintiffs shall have the right to amend their complaint as a matter of course pursuant to Fed. R. Bankr. P. 7015 and Fed. R. Civ. P. on or prior to June 14, 2023. Should the Plaintiffs amend their complaint, Defendants shall have until July 10, 2023 to answer or move with respect to the amended complaint. The parties will meet and confer regarding a briefing schedule for any motion to dismiss the amended complaint.

4. Unless otherwise agreed to by the Parties or ordered by the Court, all subsequent pleadings, motions, or other papers shall be filed in accordance with the applicable deadlines set forth in the Federal Rules of Bankruptcy Procedure, the Local Rules, any applicable scheduling order, and/or any other order of the Court.

5. The undersigned counsel hereby represent and warrant that they have full authority to execute this Stipulation on behalf of the respective Parties and that the respective Parties have full knowledge of and have consented to this Stipulation.

6. All rights, claims and defenses of the Parties are fully preserved.

Dated: May 22, 2023
Wilmington, Delaware

/s/ Matthew R. Pierce

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